## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS Dallas Division

	WIREL	ESS N	MOBIL.	E DEV	VICES	LLC.
--	-------	-------	--------	-------	-------	------

Case No. 3:13-cv-01859-N

Plaintiff,

V.

HTC CORPORATION, et al.,

Defendants.

[JURY TRIAL DEMANDED]

# AGREED MOTION TO EXTEND TIME AND CONSOLIDATE STATUS AND SCHEDULING CONFERENCES WITH RELATED MATTERS

The Parties in the above styled matter ("HTC Matter") submit this Agreed Motion to extend time to hold their status and scheduling conference and consolidate their status and scheduling conferences with four other related matters in this Court:

- Wireless Mobile Devices LLC v. LG Corp. et al., Civil Action No. 3:13-cv-01880 ("LG Matter");
- Wireless Mobile Devices LLC v. Pantech Co. Ltd. et al., Civil Action No. 3:13-cv-01881 ("Pantech Matter");
- Wireless Mobile Devices LLC v. Huawei Technologies Co. Ltd. et al., Civil Action No. 3:13-cv-01878 ("Huawei Matter"); and
- Wireless Mobile Devices LLC v. ZTE Corp. et al., Civil Action No. 3:13-cv-01882 ("ZTE Matter") (collectively, "Related Matters").

The Parties move to consolidate these status and scheduling conferences in the HTC and Related Matters in order to reduce redundancy and conserve the resources of the parties, their counsel, and the judiciary. However, this Agreed Motion is limited to the status and scheduling conferences for the HTC and Related Matters, and the parties do not intend to consolidate the HTC and Related Matters at this time.

The HTC and Related Matters involve the same Plaintiff and many of the same Defendants. On September 10, 2013, the Parties in the HTC Matter began conferring, pursuant to the Court's August 29, 2013 Order. [50]. During the HTC conference, it became readily apparent that coordination or consolidation of status and scheduling conferences with the Related Matters would be helpful to all parties involved. However, the LG and Pantech matters do not yet have an Order Requiring Status and Scheduling Conferences. In fact, some Defendants in the Pantech and LG Matters have until October 9, 2013 to answer or otherwise respond to Plaintiff's complaint. [No. 3:13-cv-01881 at doc. 17 and 3:13-cv-01880 at doc. 52].

As such, the Parties respectfully ask the Court to extend their current status and scheduling conference deadlines and consolidate all corresponding deadlines in the HTC and Related Matters to **November 4, 2013**. Thus, the corresponding joint report to the Court will be due on **November 18, 2013**.

To the extent they are distinct, the Parties in the Related Matters do not oppose and agree with this Motion. This Agreed Motion is not meant for delay, but meant to reduce redundancy and conserve the resources of the parties, their counsel, and the judiciary.

Date: September 24, 2013 Respectfully Submitted,

## /s/ Michael J. Fagan (w/ perm SDS)

Barry J. Bumgardner

Texas State Bar No. 00793424

barry@nbclaw.net Attorney-in-Charge Christie B. Lindsey

Texas State Bar No. 24041918

clindsey@nbclaw.net Michael J. Fagan, Jr.

Louisiana State Bar No. 33821

mfagan@nbclaw.net

Nelson Bumgardner Casto, P.C.

3131 West 7<sup>th</sup> Street, Suite 300 Fort Worth, Texas 76107 (817) 377-9111 (817) 377-3485 (fax)

Attorneys for Plaintiff
Wireless Mobile Devices LLC

## /s/ E. Leon Carter

E. Leon Carter

Texas State Bar No. 03914300

John Steven Torkelson

Texas State Bar No. 00795154

Sheria Dranise Smith

Texas State Bar No. 24075097

CARTER STAFFORD ARNETT HAMADA & MOCKLER

**PLLC** 

8150 N Central Expressway

**Suite 1950** 

Dallas, TX 75206 214/550-8188 Fax: 214/550-8185

--and--

Kevin P Anderson Karin A. Hessler Wiley Rein LLP 1776 K Street NW Washington, DC 20006

202/719-3586

Attorneys for Defendants Verizon Communications Inc. and Cellco Partnership d/b/a Verizon Wireless

#### /s/ Dustin M. Mauck (w/ perm. SDS)

Brett C Govett

State Bar No. 08235900

Dustin M. Mauck

State Bar No. 24046373

Gita Srivastava

State Bar No. 24083898

Michael B. Regitz

State Bar No. 24051238

Waheed U Khan

State Bar No. 24049959

FULBRIGHT & JAWORSKI LLP (NORTON ROSE

FULBRIGHT LLP)

2200 Ross Ave Suite 2800 Dallas, TX 75201-2784 214/855-8118

Fax: 214/855-8200 FAX

Attorneys for Defendant AT&T Mobility LLC

## /s/ Brett E. Cooper (w/ perm. SDS)

Steven J. Pollinger

Texas Bar Number 24011919

Eric C. Green

Texas Bar Number 24069824

McKOOL SMITH, P.C.

300 W. 6th Street, Suite 1700

Austin, TX 78701

Telephone: (512) 692-8700

Fax: (512) 692-8744

Brett E. Cooper

New York State Bar No. 4011011

David R. Dehoney

New York State Bar No. 4616595

McKOOL SMITH, P.C.

One Bryant Park, 47th Floor

New York, NY 10036

Telephone: (212) 402-9400

Fax: (212) 402-9444

Attorneys for Defendant T-Mobile US Inc.

### /s/ Kelly D. Hine (w/ perm. SDS)

Kelly D. Hine

Texas State Bar No. 24002290

PERKINS COIE LLP

2001 Ross Ave.

**Suite 4225** 

Dallas, TX 75201

Phone: (214) 965-7730

Fax: (214) 965-7799

John P. Schnurer

Texas State Bar No. 24072628

Kevin Patariu

Texas State Bar No. 24074859

PERKINS COIE LLP

11988 El Camino Real, Suite 200San Diego,

CA 92130-3334

Phone: (858) 720-5700

Fax: (858) 720-5799

Attorneys for Defendants HTC Corp. and HTC America, Inc.

# /s/ Mark W. McGrory (w/ perm. SDS)

Jeffrey G Hamilton
Texas State Bar No. 00793886
Matthew C Acosta
Texas State Bar No. 24062577
JACKSON WALKER LLP
901 Main St
Suite 6000

Dallas, TX 75202-3797 214/953-6034

Fax: 214/661-6637

--and--

Lawrence Allen Rouse Kansas State Bar No. 22308 Mark W McGrory Kansas State Bar No. 12316 ROUSE HENDRICKS GERMAN MAY PC

1201 Walnut 20th Floor Kansas City, MO 64106 816/471-7700

Attorneys for Defendants Sprint Solutions, Inc. and Sprint Spectrum LP

## Wireless Mobile Devices LLC v. LG Corp. et al., Civil Action No. 3:13-cv-01880

## /s/ Herbert H. Finn (w/ perm. SDS)

Herbert H Finn Illinois Bar No. 6205685 GREENBERG TRAURIG LLP 77 West Wacker Drive Suite 3100 Chicago, IL 60601 312/456-8427

Attorney for Defendant LG Electronics USA, Inc.

## Wireless Mobile Devices LLC v. Pantech Co. Ltd. et al., Civil Action No. 3:13-cv-01881

No Distinct Parties Have Appeared

## Wireless Mobile Devices LLC v. Huawei Technologies Co. Ltd. et al., Civil Action No. 3:13-cv-01878

/s/Robert C. Earle (w/ perm. SDS)

Robert C. Earle

Texas State Bar No. 24002029

Email: earle@fr.com James E. Youngblood

Texas State Bar No. 24070900

Email: youngblood@fr.com

FISH & RICHARDSON P.C.

1717 Main Street, Suite 5000

Dallas, TX 75201

(214) 747-5070 (Telephone)

(214) 747-2091 (Facsimile)

Attorneys for Defendants Huawei Technologies Co. Ltd. and Huawei Device USA Inc.

## Wireless Mobile Devices LLC v. ZTE Corp. et al., Civil Action No. 3:13-cv-01882

/s/ Everett McClyde Upshaw (w/ perm. SDS)

Everett McClyde Upshaw Texas State Bar No. 24025690 LAW OFFICE OF EVERETT UPSHAW, PLLC 1204 Gano Street Dallas, TX 75215 214/680-6005

Fax: 214/865-6086

Attorney for Defendants ZTE (USA) Inc. and T-Mobile US Inc.